

**REMARKS**

Claims 1-3 and 5-17 are pending in the above-referenced patent application. Claims 1-3 and 5-14 have been amended, claim 4 has been cancelled and claims 15-17 have been added. It is noted that these claims were not amended to overcome the rejections and objections, or in light of the cited documents. Rather, claims 1-14 were amended to more clearly delineate intended subject matter. Furthermore, it is believed that these amendments do not narrow claim scope. Rather, in some cases, the claims are even broadened. Therefore, no prosecution history estoppel should result from these claim amendments. Additionally, it is respectfully submitted that adequate support may be found in the specification for new claims 15-17. For example, adequate support may be found in page 5 line 20 to page 6 line 12, page 7 lines 14-25, Fig. 1 and Fig. 2.

In the Office Action, dated August 25<sup>th</sup>, 2005, the Examiner made various objections to claims 1, 5 and 10 for various informalities. Assignee has amended the claims to obviate the objections. Additionally, the Examiner rejected claims 1-8, 10-12 and 14 under 35 U.S.C 103(a) as being unpatentable over "Applicant's Admitted Prior Art" (APA) in view of Cheng (US Patent No. 6,052,147). This rejection is respectfully traversed. It is noted that claims 1, 5 and 10 have been amended in accordance with Examiners request.

Assignee respectfully submits that claims 1-3, 5-8, 10-12 and 14, as amended, are not rendered obvious by APA in view of Cheng. Although Assignee does not agree with the Examiner's characterization of what Applicant has admitted as prior art, it is respectfully submitted that APA, whether viewed alone or in combination with Cheng, is still lacking at least one element of the rejected claims.

As just an example, referring to claim 1, as amended, APA does not show or describe at least "an adder, to combine said amplified color signals to provide one or more output signals, and a circuit to set gains associated with said gain amplifiers to provide said one or more output signals as one or more color signals of a second color model." Additionally, Cheng does not cure this deficiency. Cheng describes an adder that may be implemented in a voltage regulating circuit and "can be included before amplified via the signal amplifier 123" (col 5:33 – col 5:34), and does not show or describe at least the

limitations noted above. For example, the adder described in Cheng performs adding functions prior to any amplifying in the voltage regulating circuit, and is materially different from what is claimed and described with respect to claim 1, as amended. See, for example, Fig. 1 of Cheng.

Assignee respectfully submits that, for at least the reasons presented above, a prima facie case of obviousness has not been established, and, therefore, claim 1, as amended, is in a condition for allowance. It is noted that many other bases for traversing the rejection could be provided, but Assignee believes that this ground is sufficient. Additionally, claims 2-3 and 5-14, as amended, are in a condition for allowance for the same and/or similar reasons as presented with reference to claim 1, as amended, and new claims 15-17 are in a condition for allowance for the same and/or similar reasons as presented with reference to claim 1, as amended. It is respectfully requested that the Examiner withdraw his rejections of these claims.

**CONCLUSION**

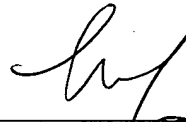
In view of the foregoing, it is respectfully submitted that all of the claims pending in this patent application, as amended, are in condition for allowance. If the Examiner has any questions, she is invited to contact the undersigned at (503) 439-6500. Reconsideration of this patent application and early allowance of all the claims is respectfully requested.

Please charge any shortages and credit any overcharges of any fees required for this submission to Deposit Account number 50-3703.

Dated: \_\_\_\_\_

11/23/05

Respectfully submitted,



\_\_\_\_\_  
Michael J. Willardson  
Patent Attorney  
Reg. No. 50,856

Berkeley Law and Technology Group, LLC  
1700 NW 167th Place, Suite 240  
Beaverton, OR 97006